## UNITED STATES DISTRICT COURT

for the

District of Nebraska

United States of America ) v. )		)			
		) Case No. 8:25MJ237			
		)			
ROBERTO LAMADRID CAMPUZANO  aka ROBERTO LAMADRID-CAMPUZAN )		)			
Defendant(s)	,				
	CRIMINAI	COMPLAINT			
I, the complainant in this	s case, state that the follow	wing is true to the best of my l	knowledge and belie	f.	
On or about the date(s) of	April 10, 2025	in the county of	Douglas	in the	
District of	Nebraska , t	the defendant(s) violated:			
Code Section		Offense Description			
8 U.S.C. 1326(a) & (b)(2)	oved alien after having been o	convicted of an aggra	avated		
This criminal complaint	is based on these facts:				
See attached affidavit					
✓ Continued on the atta	ched sheet.				
		741:	/ / // ·		
			ha L. Hennin uplainant's signature	9	
		Micha	a Henning, SA, HSI		
Sworn to before me and sign	ed in my presence.		inted name and title		
Sworn to before me by telephone or other reliable electronic means.			$\mathcal{O}$		
Date: 4/10/2025	_	1	yell-		
		j	Judge's signature		
City and state: C	maha, Nebraska		son, U.S. Magistrate	Judge	
		Pri	inted name and title		

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

8:25MJ237

ROBERTO LAMADRID CAMPUZANO aka ROBERTO LAMADRID-CAMPUZAN,

Defendant.

### AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT FOR THE ARREST OF ROBERTO LAMADRID CAMPUZANO

I, Micha Henning, a Special Agent (SA) with the United States Department of Homeland Security (DHS), Homeland Security Investigations (HSI), being first duly sworn, hereby depose and state as follows:

#### **INTRODUCTION AND AGENT BACKGROUND**

- 1. I make this affidavit in support of an application for a criminal complaint and warrant to arrest Roberto LAMADRID CAMPUZANO aka ROBERTO LAMADRID-CAMPUZAN for violations of Title 8, United States Code, Sections 1326(a) and (b)(2).
- 2. I am a Special Agent with the Homeland Security Investigations (HSI) and have been since March 2024. During my employment with HSI, I have attended and graduated from the HSI Academy at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. While employed by HSI, I have investigated federal criminal violations related to immigration. I have gained experience through training at FLETC and everyday work relating to conducting these types of investigations. HSI agents have the authority to investigate violations of the Immigration and Nationality Act, Title 8, United States Code, Title 18, United States Code and other related statutes.

- 3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.
- 4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that a violation of Title 8, United States Code, Section 1326(a) has been committed by Roberto LAMADRID CAMPUZANO.

#### PROBABLE CAUSE

- 5. ROBERTO LAMADRID CAMPUZANO aka ROBERTO LAMADRID-CAMPUZAN (hereinafter "defendant"), came to the attention of your Affiant, on April 08, 2025, after HSI in Omaha, Nebraska, received information from local law enforcement regarding a traffic stop conducted by the Bellevue Police Department (BPD). On April 04, 2025, an officer with BPD stopped a silver 2006 Nissan Murano with Nebraska license plates, YWF653, at or near the intersection of Drexel Street and South 42<sup>nd</sup> Street, in Omaha, Nebraska, and encountered the defendant. The defendant was issued a citation for speeding and operating a motor vehicle without a driver's license and released. The defendant provided the necessary biographical information with a residential address of 4311 Madison Street, Omaha, Nebraska.
  - 6. Your Affiant completed the following investigative steps:
    - a. A check of the defendant's criminal history revealed the following:
      - On December 30, 2005, the defendant was arrested by the Sarpy County Sheriff's Office, Nebraska, for 3<sup>rd</sup> degree assault.
      - ii. On June 15, 2006, the defendant was arrested by Council Bluffs Police

Department, Iowa, for attempted murder. He was subsequently convicted of this offense and received a sentence of 25-years imprisonment in the Iowa Department of Corrections.

- iii. Defendant is identified by the Department of Homeland Security as a member of the designated terrorist organization, Mara Salvatrucha (MS-13).
- b. A check of the defendant's immigration history revealed:
  - i. Defendant was born in Morelos, Mexico, and is a citizen of Mexico.
  - ii. Defendant has no legal right to enter or remain within the United States.
  - iii. On June 06, 2006, the defendant was ordered removed by an Immigration Judge in Omaha, Nebraska.
  - iv. On May 30, 2014, defendant was removed from the United States through the Brownsville, Texas Port of Entry.
  - v. Defendant illegally reentered the United States at an unknown time and place, and as set forth below, is presently located in the District of Nebraska.

#### c. Surveillance was conducted:

- i. On April 10, 2025, at approximately 6:30 a.m., special agents from HSI and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) observed the defendant exit the residence at 4311 Madison Street, Omaha, Nebraska, and enter the driver's seat of a silver 2006 Nissan Murano bearing Nebraska registration YWF653. This is the same vehicle the defendant was operating on April 4, 2025, when stopped by BPD.
- ii. Special agents surveilled the defendant to a construction worksite near 187<sup>th</sup>

Court and North Pinkney Plaza in Elkhorn, Nebraska. Photographs of the defendant were taken when he arrived at the worksite and exited his vehicle. These photographs were compared to known law enforcement images of LAMADRID CAMPUZANO. It is your affiant's belief that the person surveilled on April 10, 2025, is LAMADRID CAMPUZANO.

- d. Defendant was arrested for administrative charges and his identity was confirmed:
  - Special agents from Homeland Security Investigations contacted the defendant at his workplace on April 10, 2025, at approximately 12:10 p.m. He verbally confirmed his identity and was arrested for violating Section 212 of the Immigration & Nationality Act by being present in the United States without prior admission or parole.
  - ii. The defendant was transported to the Immigration & Customs Enforcement office in Omaha, Nebraska, where his biometrics were collected. The defendant's fingerprints were scanned and submitted into the FBI's Integrated Automated Fingerprint Identification System (IAFIS). The IAFIS system compared defendant's current fingerprint impressions to fingerprint impressions maintained in the database relating to persons who previously had been arrested by the Department of Homeland Security (DHS) or other law enforcement agencies. This comparison revealed the defendant's identity as Roberto LAMADRID CAMPUZANO.
  - iii. As a result of the positive match of fingerprints, your Affiant was able to locate a unique alien registration file (A 200127762) relating to this

defendant. The defendant's alien registration file contains photographs, fingerprints, and immigration documents identifying defendant as a citizen and national of Mexico who was removed from the United States to Mexico on May 30, 2014, pursuant to an Immigration Judge's final order of removal on October 6, 2006.

- iv. A search of DHS indices failed to produce any current record showing an application had been made for the defendant to lawfully enter or be lawfully admitted into the United States.
- 7. As a result of my review of records and information gathered from sources described above your Affiant believes there is probable cause that defendant is in violation of Title 8, United States Code, Sections 1326(a) and (b)(2), as an alien who is found in the United States after having been removed and who had departed while an order of removal was outstanding and unlawfully reentered without having obtained the consent of the Attorney General or her successor, the Secretary of Homeland Security to reapply for admission to the United States.

Your Affiant states that all statements contained in this affidavit are true and correct to the best of his/her knowledge.

Respectfully submitted,

Micha L. Henning
Micha Henning
Special Agent

Homeland Security Investigations

SUBSCRIBED and SWORN to before me by telephone or other reliable electronic means the

\_\_\_\_10th day of April 2025.

RYAN C. CARSON

United States Magistrate Judge

District of Nebraska